

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 00-6307CR-DIMITROULEAS

UNITED STATES OF AMERICA,
Plaintiff,

vs.

VALERIE ENRIQUE and
AIRBAGS EXPRESS, INC.
Defendant(s).

11/27/2000
00 NOV 24 2000
CLERK'S OFFICE
SOUTHERN DISTRICT OF FLORIDA
FBI
[Signature]

MOTION FOR TWENTY DAY EXTENSION OF TIME TO FILE MOTIONS

COMES NOW the Defendants Valerie Enrique and Airbags Express, Inc., through counsel undersigned and makes this Motion for Twenty Day Extension of Time to File Motions and as grounds would state the following:

1. Motions are currently due on November 28, 2000.
2. A discovery conference was scheduled with the Government on even date herein and due to both the undersigned's schedule and the Government's schedule had to be canceled.
3. That the undersigned and the Government are in the process of going over their calendars and rescheduling same.
4. The undersigned has a pre-planned, pre-paid trial scheduled to Europe from November 27, 2000 through December 1, 2000.
5. Thomas Watts-Fitzgerald, Assistant United States Attorney, has indicated that he has no objection to the granting of this motion, and would request that this case be reset toward the end of January.

WHEREFORE the Defendant request this Motion be granted.

[Signature]

I HEREBY CERTIFY that a true and correct copy of the foregoing was furnished to Thomas Watts-Fitzgerald, Esq., Office of the United States Attorney, 99 N.E. 4th Street, Miami, Florida 33132, this 21 day of November, 2000.

HADDAD & HESTER, P.A.
One Financial Plaza, Suite 2612
Fort Lauderdale, Florida 33394
[954] 467-6767

By: 

FRED HADDAD
Florida Bar No. 180891